IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

LAMILL HOLDING COMPANY, AND AGA CAPITAL, LLC, Plaintiffs, vs. BITMAIN TECHNOLOGY GEORGIA LIMITED Defendant.	Civil Action No. _____ **Rule 26.01 Disclosures**

Defendant Bitmain Technologies Georgia Limited[1] ("Bitmain") hereby responds to the Local Civil Rule 26.01 (DSC) Interrogatories, as follows, reserving its right to supplement these responses should it become aware of additional facts or information during the course of discovery or its ongoing investigation of this matter:

(A)   **State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.**

Response: Bitmain is unaware of any persons and/or legal entities that may have a subrogation interest in Plaintiff's claim. If Bitmain becomes aware of such person(s) or legal entities, it will supplement its response.

(B)   **As to each claim, state whether it should be tried jury or nonjury and why.**

Response: Plaintiffs have requested a trial by jury on all claims. Bitmain asserts that this case should be tried nonjury as it is an action for declaratory relief involving issues of law.

(C)   **State whether the party submitting these responses is a publicly owned company and separately identify: (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly owned company of which it is a parent and; and (3) each**

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[1] Plaintiffs improperly named the defendant as Bitmain Technology Georgia Limited in this matter. The proper defendant is Bitmain *Technologies* Georgia Limited.

publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

Response: Bitmain is not a publicly owned company and not a parent of any publicly owned company. Bitmain is a wholly owned subsidiary of Bitmain Delaware Holding Company, Inc., a private corporation. Bitmain Delaware Holding Company, Inc., is a wholly owned subsidiary of Bitmain Switzerland AG, a private corporation. Bitmain Switzerland AG is a wholly owned subsidiary of Bitmain Technologies Limited, a private corporation. Bitmain Technologies Limited is a wholly owned subsidiary of Bitmain Technologies Holding Company, a private corporation. Bitmain does not have any subsidiaries that are not wholly owned by it and have issued shares to the public. Bitmain does not own 10% or more of any publicly owned company.

(D)   State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civil Rule 3.01.

Response: This case was removed to the Florence Division because the original state court action was filed in the South Carolina Court of Common Pleas for Marlboro County. Bitmain reserves the right to defend against Plaintiffs' claim on the ground of improper venue.

(E)   Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

Response: Bitmain is not aware of any related action filed in this District. If Bitmain becomes aware of any such action, it will supplement this response.

(F)   [Defendants only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

Response: Plaintiffs improperly named the defendant as Bitmain Technology Georgia Limited in this matter. The proper defendant is Bitmain *Technologies* Georgia Limited. Bitmain has not yet been served in this matter and the undersigned counsel requests that service be perfected under the relevant rules.

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(G)   **[Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.**

Response: None at this time. Bitmain reserves the right to supplement its response to this interrogatory.

(H)   **[Parties in a Diversity Case.] In an action in which jurisdiction is based on diversity under 28 U.S.C. Section 1332(a), a party must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party.**

Response: Bitmain is a Georgia corporation with its principal place of business in Roswell, Georgia.

Respectfully submitted,

NELSON MULLINS RILEY & SCARBOROUGH LLP

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Attorney for Defendant Bitmain Technologies Georgia Limited

Columbia, South Carolina
DATED: August 2, 2024

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Certificate of Service

I hereby certify that a true copy of the foregoing Defendant Bitmain Technologies Limited's Disclosure of Corporate Interests was served by electronic mail on August 2, 2024 on the following counsel for Plaintiffs Lamill Holding Company and AGA Capital, LLC:

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/s/ Paul T. Collins _____
Attorney for Defendant